FREEMAN, NOOTER & GINSBERG

ATTORNEYS AT LAW

LOUIS M. FREEMAN THOMAS H. NOOTER* LEE A. GINSBERG 75 MAIDEN LANE SUITE 503 NEW YORK, N.Y. 10038

*NY AND CALIF. BARS

(212) 608-0808 TELECOPIER (212) 962-9696

July 9, 2021

Honorable Paul G. Gardephe United States District Judge Southern District of New York Thurgood Marshal Courthouse 40 Foley Square New York, NY 10007

> <u>UNOPPOSED Letter Motion</u> One-time Bail Modification for Travel to The GAmbia

RE: United States v. Omar Jaata, 18 Cr. 162 (PGG)

Your Honor:

I am writing to request permission for my client to make an international trip to The Gambia to see members of his family who are in poor health, and to take his son to meet those members of the family. Note that Mr. Jaata is an American citizen, but originally from The Gambia, which is why he has family there.

I would also note that in February of 2020 I made a similar request, which was granted by this Court, and Mr. Jaata made the trip and returned as planned. (See Docket Entry #58, February 27, 2020).

I have consulted with the Assistant United States Attorney, Jason Richman, on this request and he says his office "takes no position."

I also consulted with his Pre-Trial Services Officer, Ms. Franchesca Tessier-Miller, and she said that Pre-Trial "does not take a position on international

travel."

He already has a reservation for flights leaving New York on July 16, 2021, and returning to New York on July 30, 2021. He (and his son) will stay with family while he is in The Gambia.

As part of this request I ask that the Court permit Pre-Trial Services to release Mr. Jaata's passport to him so that he can make the travel arrangements and make the trip, on condition that he return it to Pre-Trial Services on the next business day after he returns to the United States.

Thank you very much for Your Honor's consideration of this request.

Sincerely,

<u>/s/ Thomas H. Nooter</u> Attorney for Defendant

cc: AUSA Jason Richman, by ECF US Pre-Trial Services Officer Franchesca Tessier-Miller, by email

MEMO ENDORSED

The Application is granted.

SP ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: July 12, 2021